

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE J.P. MORGAN STABLE VALUE FUND)
ERISA LITIGATION)
_____)

Master File No. 12-cv-2548-VSB

**PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEY'S FEES, COSTS, AND
SERVICE PAYMENTS**

Pursuant to Fed. R. Civ. Proc. 23(h) and the Settlement Agreement in this matter, Plaintiffs, through undersigned counsel, move this Court for an Order awarding: (1) Plaintiffs and Class Counsel \$25 million in attorneys' fees; (2) Plaintiffs and Class Counsel \$1,468,795.86 in litigation expenses; and (3) Plaintiffs Rosemary Dotson, Caroleta M. Duran, Nancy Dye, Daryl Evans, John M. Gates, Mark D. Grandy, Clay Hedges, Michael Knee, Terry J. Koch, Eric M. Murphy, Scott Newell, John Stolwyk and Richard Whitley \$20,000 each as a class representative service award, all to be paid from the \$75 million settlement fund established in this matter.

This Motion is based on: (1) Plaintiffs' Memorandum in Support of Motion for an Award of Attorney's Fees, Costs, and Service Payments; (2) the attached Declarations of Class Counsel and the exhibits attached to those Declarations; (3) the records and files in this action; and (4) such other matters as may come to the Court's attention prior to or at the argument on this Motion and the hearing on final approval of the settlement.

Dated: June 19, 2019

Respectfully submitted,

s/ Jason H. Kim

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